

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

ELIZABETH FREEMAN

Debtor

Chapter 13

Bankruptcy No. 18-13303-AMC

TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 05/17/2018.
3. This Motion to Dismiss has been filed for the following reason(s):
 - The Debtor(s) has/have failed to commence or continue making timely payments to the Trustee as required by 11 U.S.C. Section 1326.

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, requests that the Court, after a hearing, enter an Order dismissing this case.

Date: 03/25/2021

Respectfully submitted,

/s/ Polly A. Langdon, Esq.

Polly A. Langdon, Esq.

for

Scott F. Waterman, Esq.

Standing Chapter 13 Trustee

2901 St. Lawrence Avenue, Suite 100

Reading, PA 19606

Telephone: (610) 779-1313